- 1	11		
1	CHAVEZ & GERTLER LLP		
2	Jonathan E. Gertler (Bar No. 111531) Dan L. Gildor (Bar No. 223027)		
3	42 Miller Avenue Mill Valley, California 94941		
4	Tel: (415) 381-5599 Fax: (415) 381-5572		
5	ANDRUS ANDERSON LLP		
6	Lori E. Andrus (Bar No. 205816) 155 Montgomery Street		
7	San Francisco, CA 94104 Tel: (415) 986-1400		
8	Fax: (415) 986-1474		
9	Attorneys for Plaintiff SHAMEKA BOLTON the Proposed Class and Subclass		
10			
11	UNITED STATES DISTRICT COURT		
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
13			
14	SHAMEKA BOLTON, individually and on)	Case No: C-12-04466 LB	
15	behalf of all others similarly situated,	CLASS ACTION	
16	Plaintiff,	UPDATED JOINT CASE	
17) vs.)	MANAGEMENT CONFERENCE STATEMENT/PROPOSED CASE	
18	U.S. NURSING CORP., and DOES 1 through)	MANAGEMENT SCHEDULE	
19	50, inclusive,	Judge: Hon. Mag. Laurel Beeler	
20	Defendants.	Date: February 21, 2013 Time: 10:30 a.m.	
21)	Crtrm.: C – 15th Floor	
22	Pursuant to the Court's Order Continuing Case Management Conference And Requiring		
23	The Parties To File Proposed Case Deadlines, Plaintiff Shameka Bolton ("Plaintiff") and		
24	Defendant U.S. Nursing Corp. ("U.S. Nursing") submit the following Proposed Case		
25	Management Schedule.		
26	//		
27	//		
28			
	1		

- 1		
1	Case Event	Filing Date/Disclosure Deadline/Hearing Date
2	Mediation/ADR Completion Date	April 3, 2013
3	Date to seek leave to add new parties or amend the pleadings	September 12, 2013
5	Deadline to file Class Certification Motion	October 7, 2013
6	Deadline to file Opposition to Class Certification	November 7, 2013
7	Deadline to file Reply to Class Certification Motion	November 25, 2013
8	Hearing on Class Certification	December 13, 2013
10	Updated Joint Case Management Conference Statement	January 3, 2014
11	Further Case Management Conference	January 10, 2014 at 10:30 a.m.
12 13	Expert disclosures required by Federal Rules of Civil Procedure	January 10, 2014
14	Rebuttal expert disclosures	January 24, 2014
15	Expert and Non-Expert discovery completion date	February 28, 2014
16 17	Last hearing date for dispositive motions	March 21, 2014 at 11:00 a.m.
18	Meet and confer re pretrial filings	March 28, 2014
19	Pretrial filings due	April 4, 2014
20	Oppositions, Objections, Exhibits, and Depo Designations due	April 18, 2014
22	Final Pretrial Conference	April 24, 2014 at 10:30 a.m.
23	Trial	May 5, 2014 at 8:30 a.m
24	Length of Trial	10 days
25		
26	//	
27	//	
28	//	

2

Case3:12-cv-04466-LB Document33 Filed02/13/13 Page3 of 5

1	Respectfully submitted,	
2		
3	Dated: February 13, 2013	Dated: February 14, 2013
4	ANDRUS ANDERSON LLP	PAUL HASTINGS LLP
5	By: /s/ Lori E. Andrus Lori E. Andrus	By: /s/ Thomas E. Geidt Thomas E. Geidt
6	L: E A - L (SDN 205916)	Thomas E. Geidt (SBN 080955)
7	Lori E. Andrus (SBN 205816) ANDRUS ANDERSON LLP 155 Montgomery Street	Paul W. Cane, Jr. (SBN 100458) Jeffrey P. Michalowski (SBN 248073)
8	San Francisco, ČA 94104	Chase W. Ensign (SBN 275035)
9	Tel: (415) 986-1400 Fax: (415) 986-1474	PAUL HASTINGS LLP
	lori@andrusanderson.com	55 Second Street Twenty-Fourth Floor
10	CHAVEZ & GERTLER LLP	San Francisco, CA 94105-3441
11	Jonathan E. Gertler (SBN 111531)	Tel.: (415) 856-7000
12	Dan L. Gildor (SBN 223027) 42 Miller Avenue	Fax: (415) 856-7100
	Mill Valley, California 94941	tomgeidt@paulhastings.com
13	Tel: (415) 381-5599 Fax: (415) 381-5572	paulcane@paulhastings.com
14	jon@chavezgertler.com	jeffmichalowski@paulhastings.com chaseensign@paulhastings.com
15	dan@chavezgertler.com	<u>enascensign@paumastings.com</u>
16	Attorneys for Plaintiff and the Proposed Class and Subclass	Attorneys for Defendant
17	•	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

ECF CERTIFICATION Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that she has obtained concurrence regarding the filing of this document from the signatories to the document. Dated: February 13, 2013 /s/ Lori E. Andrus Lori E. Andrus ANDRUS ANDERSON LLP 155 Montgomery Street, Suite 900 San Francisco, CA 94104 Telephone: (415) 986-1400 Facsimile: (415) 986-1474 lori@andrusanderson.com

CERTIFICATE OF SERVICE I hereby certify that on February 13, 2013, I electronically filed the above document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Court's Electronic Mail Notice List. I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. /s/ Lori E. Andrus